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CITY OF LOS ANGELES,
LOS ANGELES POLICE DEPARTMENT, and
LOS ANGELES BOARD OF POLICE COMMISSIONERS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

GARRY MATTHEWS and DOMINIC ROSS HUNN, individually and as class representatives,

Plaintiffs,

vs.

CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT, AND LOS ANGELES BOARD OF POLICE COMMISSIONERS,

Defendants.

) Case No.: 22-cv-02944-FLA-PD

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) **STIPULATION PURSUANT TO LOCAL RULE 7-1 REGARDING THE CITY OF LOS ANGELES'S MOTION TO DISMISS AND THE SCHEDULING CONFERENCE**

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) Action Filed: 05/03/2022

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1 Pursuant to Local Rule 7-1, Plaintiffs and the City of Los Angeles (the “City”),
2 through their attorneys of record, enter into the following stipulation regarding the City’s
3 previously filed motion to dismiss:

4 Whereas, on June 16, 2022, the City filed a motion to dismiss the Plaintiffs’
5 Complaint (ECF Nos. 23-24), which is scheduled to be heard on July 29, 2022;

6 Whereas, given the hearing date for the City’s motion to dismiss, the Court set a
7 Scheduling Conference for the same date, July 29, 2022, at 1:00 p.m.

8 Whereas, on or about June 23, 2022, the United States Supreme Court issued a
9 decision in *New York State Rifle & Pistol Association, Inc. et al. v. Bruen Superintendent*
10 *of New York State Police, et al.*, wherein the United States Supreme Court held that New
11 York State’s “proper cause” requirement to obtain a license to carry a handgun outside
12 the home is unconstitutional;

13 Whereas, on June 27, 2022, the parties met and conferred regarding the impact of
14 that decision on this case;

15 Whereas, the parties have agreed that the City will withdraw its presently filed
16 motion to dismiss (ECF Nos. 23-24), and will file a new motion to dismiss;

17 NOW THEREFORE, for judicial economy, the parties stipulate as follows:

- 18 1. The City’s motion to dismiss (ECF Nos. 23-24) shall be withdrawn;
- 19 2. The City shall file a new motion to dismiss the Complaint no later than August
20 1, 2022;
- 21 3. Plaintiffs shall file their response to the motion to dismiss no later than
22 September 12, 2022.
- 23 4. The City shall file its reply in support of the motion to dismiss or otherwise
24 respond to Plaintiffs’ response no later than September 30, 2022.
- 25 5. The City’s motion to dismiss will be heard on October 14, 2022, at 1:30 p.m.,
26 or another date convenient for the Court.
- 27 6. The Scheduling Conference, previously set for July 29, 2022, is rescheduled
28 for October 14, 2022 at 1:00 p.m., or another date convenient for the Court.

1 Accordingly, the parties respectfully request that the Court adopt the proposed
2 order granting the stipulation described herein.

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4 Dated: July 5, 2022

OFFICE OF THE CITY ATTORNEY OF LOS
5
6 ANGELES

7 By:
8

/s/ Benjamin Chapman
9 Benjamin Chapman

10 Attorneys for Defendants,
11 CITY OF LOS ANGELES,
12 LOS ANGELES POLICE DEPARTMENT,
13 and LOS ANGELES BOARD OF POLICE
14 COMMISSIONERS

15
16 Dated: July 5, 2022

LAW OFFICE OF JOVAN BLACKNELL

17 By:
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/s/ Jovan Blacknell
19 Jovan Blacknell

20 Attorneys for Plaintiffs

21
22 Dated: July 5, 2022

LAW OFFICE OF WILLIAM CLAIBORNE

23
24 By:
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/s/ William Claiborne
26 William Claiborne

1 Attorneys for Plaintiffs
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9 Pursuant to Local Rule 5-4.3.4(a)(2)(i), all signatories listed, and on whose behalf
10 the filing is submitted, concur in the filing's content and have authorized the filing.

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